

DEQ AIR QUALITY PROGRAM 1410 N. Hilton, Boise, ID 83706 For assistance, call the Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3 04/03/07

Please see instructions on page 2 before filling out the form.

C	OMPAN	Y NAME, FACILITY NAME, AND FACILITY ID NUMBE	R											
1. Compan	y Name	NxEdge, Inc.												
2. Facility	2. Facility Name 3. Facility ID No. 001-00202													
Brief Project Description - Facility Equipment and Throughput Modifications One sentence or less														
	PERMIT APPLICATION TYPE													
5. New Facility New Source at Existing Facility Unpermitted Existing Source Modify Existing Source: Permit No.: P-040007 Date Issued: 07/22/2005 Required by Enforcement Action: Case No.:														
6. Mind	6. Minor PTC Major PTC													
		FORMS INCLUDED												
included	N/A	Forms	DEQ Verify											
\boxtimes		Form GI – Facility Information												
. 🛛		Form EU0 – Emissions Units General												
	\boxtimes	Form EU1 - Industrial Engine Information Please Specify number of forms attached:												
	\boxtimes	Form EU2 - Nonmetallic Mineral Processing Plants Please Specify number of forms attached:												
\boxtimes		Form EU3 - Spray Paint Booth Information Please Specify number of forms attached: 4												
	\boxtimes	Form EU4 - Cooling Tower Information Please Specify number of forms attached:												
	\boxtimes	Form EU5 – Boiler Information Please Specify number of forms attached:												
	\boxtimes	Form HMAP – Hot Mix Asphalt Plant Please Specify number of forms attached:												
	\boxtimes	Form CBP - Concrete Batch Plant Please Specify number of forms attached:												
	\boxtimes	Form BCE - Baghouses Control Equipment												
	\boxtimes	Form SCE - Scrubbers Control Equipment												
\boxtimes		Forms EI-CP1 - EI-CP4 - Emissions Inventory– criteria pollutants (Excel workbook, all 4 worksheets)	· 🔲											
\boxtimes		PP – Plot Plan												
\boxtimes		Forms MI1 – MI4 – Modeling (Excel workbook, all 4 worksheets)												
\boxtimes		Form FRA – Federal Regulation Applicability												

DEQ USE ONLY
Date Received
RECEIVED
MAY 3 0 2008
Department of Environmental Otrality State Air Program
Project Number
Payment / Fees Included?
Yes No No
Check Number

AIR QUALITY PERMIT TO CONSTRUCT MODIFICATION APPLICATION FORM DOCUMENTATION

NxEdge, Inc. 7500 W. Mossy Cup Boise, Idaho 83709

May 19, 2008

Prepared for:

NxEdge, Inc.

7500 W. Mossy Cup Boise, Idaho 83709

For the Facility at:

7500 W. Mossy Cup

Boise, Idaho 83709

Prepared by:

TORF Environmental Management

3459 E. Boulder Heights Drive

Boise, Idaho 83712

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Sr. Engineer

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Chris Johnson Meteorologist

TORF ENVIRONMENTAL MANAGEMENT Aug. 19.2008

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AIR QUALITY PERMIT TO CONSTRUCT MODIFICATION APPLICATION NxEdge, Inc. 7500 W. Mossy Cup Boise, Idaho 83709

1. SUMMARY

NxEdge, Inc. (NxEdge) proposes to modify the conditions of its Air Quality Permit to Construct (PTC) No. P-040007 issued for the facility at 7500 West Mossy Cup Street, Boise, Idaho. The modification includes changes to the permit conditions of existing air emissions sources, and the addition of new sources. New air emitting sources at the facility include metal blasting and coating equipment and blasting cabinets. The results of the inventory of estimated regulated air emissions associated with the modification and air dispersion modeling of those emissions demonstrate that the facility is eligible to receive a modified Idaho Air Quality Permit to Construct (PTC).

The facility will not be a major facility for the purposes of the Permit to Construct requirements.¹ Emission calculations demonstrate that permit-controlled NSR regulated pollutant rates are less than 100 tons per year. Controlled emissions of individual Hazardous Air Pollutants (HAPs) are less than 10 tons per year. Controlled emissions of combined HAPs are less than 25 tons per year. Therefore, the facility is not a major facility (qualifies as "synthetic minor") in terms of Tier I operating permit requirements.² Ambient concentrations of all Toxic Air Pollutants (TAPs) are within acceptable levels.³

³ Ibid., Section 210.08.



¹ Idaho Department of Environmental Quality (IDEQ), Rules For The Control Of Air Pollution In Idaho, IDAPA 58 Title 01, Chapter 01, Section 200.

² Ibid., Section 008.10.



PERMIT TO CONSTRUCT APPLICATION

Revision 3 03/26/07

Please see instructions on page 2 before filling out the form.

All information is required. If information is missing, the application will not be processed.

		IDENTIFICATION						
1.	Company Name	NxEdge, Inc.						
2.	Facility Name (if different than #1)							
3.	Facility I.D. No.	001-00202						
4.	Brief Project Description:	Facility Equipment and Throughput Modifications						
		FACILITY INFORMATION						
5.	Owned/operated by: (√ if applicable)	Federal government County government State government City government						
6.	Primary Facility Permit Contact Person/Title	Carl Seelhoff						
7.	Telephone Number and Email Address	208-362-7200 cseelhoff@nxedgeinc.com						
8.	Alternate Facility Contact Person/Title	Nikolaos Xydas						
9.	Telephone Number and Email Address	208-362-7200 nxydas@nxedgeinc.com						
10.	Address to which permit should be sent	7500 W. Mossy Cup Street						
	City/State/Zip	Boise, ID 83709						
12.	Equipment Location Address (if different than #10)							
13.	City/State/Zip							
14.	Is the Equipment Portable?	Yes No						
15.	SIC Code(s) and NAISC Code	Primary SIC: 3471 Secondary SIC (if any): 3479 NAICS: 332812/332813						
16.	Brief Business Description and Principal Product	Application of Engineered Coatings, Precision Manufacturing, and Material Cleaning and Revitalization Services						
17.	Identify any adjacent or contiguous facility that this company owns and/or operates	7484 W. Mossy Cup Street (partial occupancy)						
\$2000 \$2000 \$1000		PERMIT APPLICATION TYPE						
18.	Specify Reason for Application	□ New Facility □ Unpermitted Existing Source □ Modify Existing Source: Permit No.:P-040007 Date Issued: 07/22/2005 □ Permit Revision □ Required by Enforcement Action: Case No.:						
		CERTIFICATION						
lı	N ACCORDANCE WITH IDAPA 58.01.01.123 (F AFTER REASONABLE INQUIRY,	RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO), I CERTIFY BASED ON INFORMATION AND BELIEF FORMED THE STATEMENTS AND INFORMATION IN THE DOCUMENT ARE TRUE, ACCURATE, AND COMPLETE.						
19.	Responsible Official's Name/Title	Tom Schiers/ Vice-President						
20.	RESPONSIBLE OFFICIAL SIGNATU	JRE Thomas Chies Date: 5/23/08						
21.	Check here to indicate you would like to review a draft permit prior to final issuance. Check here to indicate you would like to review a draft permit prior to final issuance.							

Permit to Construct Modification Application NxEdge, Boise, Idaho May 19, 2008 Page 2-1

2. GENERAL INFORMATION - FORM GI DOCUMENTATION

NxEdge currently operates with authorization of PTC No. P-040007 issued July 22, 2005. A PTC Modification Exemption Concurrence was received from Mike Simon on May 10, 2006, which allowed minor changes to emissions from the plasma and wire arc spray tube coating area. However, for this PTC Modification analysis, to allow comparison with the previous full-facility emissions analysis, all emission changes were calculated with respect to the original permit.





PERMIT TO CONSTRUCT APPLICATION

Revision 3 03/27/07

Please see instructions on page 2 before filling out the form.

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			DENTIFICAT	TION					
Company Name:		Facility N	Name:		Facil	ity ID No:			
NxEdge, Inc.					001-	00202			
Brief Project Description:		Facility E	Equipment an	d Throughput	Modifications				
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION									
1. Emissions Unit (EU) Name:	GEN 3 P	LASMA SPRA	Y APPLICATOR	(FOR SS TUBES)					
2. EU ID Number:	GEN3								
3. EU Type:	☐ New ⊠ Modif		Unpermitted Exermitted Source	xisting Source Previous Perm	it #:P-040007	Date Issued: 07/22/2005			
4. Manufacturer:	BRIGS								
5. Model:	BPC-180								
6. Maximum Capacity:	30.4 LB/I	HR POWDER							
7. Date of Construction:	2003								
8. Date of Modification (if any)	AWAITI	NG PTC MODI	IFICATION APPI	ROVAL - 2Q 2008					
9. Is this a Controlled Emission Unit?	☐ No	in the street, and the street,	the state of the state of the state of the state of	all accelerations of a section of	If No, go to line 1	8.			
	alaborat d	EMISSION	IS CONTROL	EQUIPMEN	I				
10. Control Equipment Name and ID:		Cyclone and Filter Assembly- MAC1							
11. Date of Installation:		2003 12. Date of Modification (if any):							
13. Manufacturer and Model Number:		Donaldsn Torit Model 20 Cyclone & MAC 4M2F16 Filter Unit with high-efficiency cartridge filters (16)							
14. ID(s) of Emission Unit Controlled:		GEN3							
15. Is operating schedule different than elunits(s) involved?	nission	☐ Yes ☑ No							
16. Does the manufacturer guarantee the efficiency of the control equipment?	control	☑ Yes ☐ No (If Yes, attach and label manufacturer guarantee)							
emolerity of the control equipment:	L	Pollutant Controlled							
	P M	PM10	SO ₂	NOx	VOC	со			
Control Efficiency 0.00	02 gr/scf	0.002 gr/scf							
17. If manufacturer's data is not available to support the above mentioned control e		eparate sheet	of paper to prov	ide the control eq	uipment design s	pecifications and performance data			
		PERATING	SCHEDULE	(hours/day l	nours/year, o	r other)			
Analysis and the second of the		EK, 50 WEEKS	attern - and attended of the state of the st	A transferance and transferance of the					
·	8760 HRS/		J/ 111						
			QUESTED L	IMITS					
20. Are you requesting any permit limits	? 🛛 Y			ck all that apply b	elow)				
Operation Hour Limit(s):	☐ Operation Hour Limit(s):								
☐ Production Limit(s):									
☐ Material Usage Limit(s):									
☐ Limits Based on Stack Testing	Pleas	Please attach all relevant stack testing summary reports							
☑ Other:	EMIS	MISSION LIMITS ON ALUMINUM, SILICON AND PM10							
21. Rationale for Requesting the Limit(s): EMIS	SSIONS MUST	BE CONTROL	LED TO COMPL	Y WITH AMBIEN	T AIR QUALITY STANDARDS			

Permit to Construct Modification Application NxEdge, Boise, Idaho May 19, 2008 Page 3.1-1

3. GENERAL EMISSION UNITS - FORM EUO DOCUMENTATION

There are nine General Emission Units associated with this PTC modification. Five are associated with the Sputtered Targets and Services (STS) process area, where stainless steel tubes are coated with metal powders and wires via the plasma spray and wire arc spray processes. Previously this was known as the Plasma (PL) Area and Glass Business Unit, or GBU.

Two other General Emission Units addressed in this modification are associated with the Advanced Engineered Coatings (AEC) process area, where parts of various dimensions are coated with metal powders via the plasma spray process. Previously, this was known as the Semiconductor Business Unit, or SBU.

Finally, there is one General Emission Unit associated with the Cleaning and Refurbishment (C&R) Area where metal parts are cleaned, and one associated with the Fluoropolymer (FP) Area where wet and powder coatings are applied to metal parts. These two business areas where previously known collectively as Engineered Coatings (EC).

3.1 STS Gen3 Tube Spray Chamber

The STS Gen3 Tube Spray Chamber (Gen3) is used to apply metal powder to 304 Stainless Steel tubes via the plasma spray process. This unit is permitted under the existing PTC and has undergone no equipment changes. NxEdge requests a change to the permit limits which will allow unrestricted coating of tubes (based on equipment capacity) with silicon and aluminum powder.

A Brigs Model BPC-180 Spray Gun is used to apply silicon and or a silicon-aluminum blend to the exterior of tubes typically measuring 6-10 feet long and 6 inches in diameter. Emissions from Gen3 are controlled via a downstream cyclone and cartridge filter assembly (MAC1). The cyclone is a Donaldson-Torit Model 20. The filter assembly is a MAC Model 4M2F16 loaded with 16 PTFE-coated polyester cartridges. A 1600 cubic feet per minute (CFM) rated fan located on the outlet of the filter assembly draws air from the process area, through the Gen3 chamber, and then through ducting to the cyclone and filter assembly. The fan discharges horizontally outside at a height of 14.7 feet.

The Gen3 emission point and two Gen4 emission points are located within a few feet of each other and all discharge horizontally at the same height. For air dispersion modeling purposes, the three emission points are combined into one, shown as EP-1 on Plot Plan Form PP (see Section 6). This approach was used and approved for the air dispersion modeling performed in support of the original permit.

Aluminum, silicon, and particulate emissions from Gen3 are calculated in Table 3-1A (attached). All particulate emissions are conservatively assumed to consist of particulate with a diameter of 10



Permit to Construct Modification Application NxEdge, Boise, Idaho May 19, 2008 Page 3.1-2

microns or less (PM₁₀). Uncontrolled emissions were estimated using the maximum applicator rate, 24 hours per day, 365 days per year. Attached is a letter from Brig's Machining Company specifying the maximum throughput of the Brigs spray gun as 230 grams per minute (30.4 pounds per hour). NxEdge will pre-blend the silicon and aluminum when spraying a silicon-aluminum blend. Potential coating cracking issues limit the maximum aluminum concentration to 60 wt%.

Uncontrolled emissions are reduced by the amount of powder deposited on the tube. The average deposition efficiency (DE) in Gen3, as determined by NxEdge testing, is 27.9 wt%. Table 3-1B details the DE test results. A DE of 27 wt% was used in the Table 3-1A Gen3 calculations. The estimated uncontrolled emissions of silicon, aluminum, and particulate would violate ambient air quality standards. Therefore, controlled emissions are calculated.

Table 3-1B: Gen3 Deposition Efficiency

Date	Gen3 Tube ID No.	Pre-Coated Tube Weight (lbs)	Final Coated Tube Weight (lbs)	Coating Used (lbs)	Deposition Efficiency (%)
1-Sep-07	126D0029NXVDS-UNX	92.0	133.0	176.5	23.2%
2-Sep-07	126D0040NXVDS-UNX	91.5	133.9	162.3	26.1%
5-Sep-07	126D0034NXVDS-UNX	91.1	134.2	144.6	29.8%
5-Sep-07	126D0031NXVDS-UNX	92.0	134.3	142.0	29.8%
5-Sep-07	126D0030NXVDS-UNX	92.1	133.5	148.0	28.0%
6-Sep-07	126D0032NXVDS-UNX	91.8	132.6	137.4	29.7%
7-Sep-07	126D0013NXVDS-UNX	92.5	134.0	142.6	29.1%
7-Sep-07	126D0026NXVDS-UNX	91.5	134.3	139.5	30.7%
10-Sep-07	126D0037NXVDS-UNX	89.8	132.9	145.0	29.7%
10-Sep-07	126D0128VDS-1111	110.8	153.5	182.9	23.3%
13-Sep-07	126D0575VDS-1	96.0	149.7	201.6	26.6%
14-Sep-07	126D0226NXVDS	93.8	136.7	150.0	28.6%
				Average =	27.9%

Controlled emissions are calculated based on continuous operations 8760 hours per year and maximum emissions of 0.002 grains per dry cubic foot air, as certified by the filter manufacturer. Attached is a performance statement from MAC Equipment Co. for the MAC1 filter unit. Based on this control efficiency and the rated fan capacity, the maximum 24-hr averaged controlled emissions of aluminum and silicon are 0.016 and 0.027 lb/hr, respectively. The maximum particulate emissions from Gen3 are 0.027 lb/hr and 0.12 tons per year. These are the proposed permit limits for Gen3.



Table 3-1A: STS Area Emissions- Gen3 and Gen4

	EMISSION CALCULATIONS WITH UNRESTRICTED FEED AND PRODUCTION RATES																			
GEN34	ting	Coating	Contents	CAS Number	Content Conc. (wt% per MSDS)	Application Device	Maximum Applicator Feed Rate (Ib/hr) Notes 1,2	Dra-mivad	Daily Operating Hours	Maximum Daily Coating Use (lbs)	Yearly Operating Days	Maximum Annual Coating Use (Ibs)	Coating Retention on Target (%) Note 3	Uncontrolled Hourly Emissions (lb/hr)	585 TAP Screening Level (lb/hr)	Uncont. Annual Emissions (lb/yr)	Cyclone- Filter Unit: Filter Type	Control Equipment Efficiency (%) ^{Note 4}	Controlled Hourly Emissions (lb/hr) Note 4	Controlled Annual Emissions (lb/yr)
Ce: PL	е Соа	Aluminum Powder	Aluminum	7429-90-5	100.0%	Gen3: Brigs BPC-180	30.4	60%	24	438	365	159764	27.0%	13.3	0.667	116628	MAC 1: MAC PTFE- coated	99.88%	0.016	144
TS Sour	T _d	Silicon Powder	Silicon	7440-21-3	100.0%	Gen3: Brigs BPC-180	30.4	100%	24	730	365	266273	27.0%	22.2	0.667	194379	Polyester Cartridges	99.88%	0.027	240
8		Titanium Dioxide Powder	TiO ₂	13463-67-7	100.0%	Gen4: Praxair SG-100	18.8	100%	24	452	365	164969	42.0%	10.9	non-TAP	95682	MAC 2: Coated Cellulose Cartridges	99.7%	0.033	287

Criteria Pollutants Emissions Summary		PM ₁₀ Significant		lled Annual ssions		ed Hourly ssions	C	Controlled An	nual Emissi	ons
	Gen 3/Gen 4 Plasma Spray	Emission Rate (tons/yr)	Current Permit (ton/yr)	Proposed Mod. (ton/yr)	Current Permit (lb/hr)	Proposed Mod. (lb/hr)	Current Permit (ton/yr)	Proposed Mod. (ton/yr)	Emission Change, ton/yr	Emission Change, % of Significant
1	PM ₁₀ (Note 5)	15	27.5	145.0	0.039	0.060	0.093	0.264	0.171	1.1%

Hazardous	Gen3/Gen4
Pollutants Emissions Summary	No known HAPs
-	emitted

		TAP Type	TAP Screening	Uncontrld.	Controll	ed Hourly En	nissions
Toxic Air Pollutants Emissions	Gen3/Gen4 Plasma Spray	(24 hr or Annual Ave. EL)	Emission Level (lb/hr)	Proposed Mod. (ib/hr)	Current Permit (lb/hr)	Proposed Mod. (lb/hr)	Proposed Mod. (lb/yr)
Summary	Aluminum	585 (24 hr)	0.667	13.3	0	0.0165	144
	Silicon	585 (24 hr)	0.667	22.2	0.0283	0.0274	240

Notes: 1, Per manufacturer, Brigs BPC-180 maximum throughput is 230 grams/minute (30.4 lb/hr) in ideal conditions.

- 2. Per manufacturer, Praxair SG-100 maximum thoughput is 6 lbs/hr using aluminum powder with a SG of 1.37. Using TiQ powder MSDS SG of 4.3, max TiQ2 rate is 18.8 lb/hr.
- 3. Based on NxEdge testing (see Tables 3-1B and 3-2).
- 4. For MAC filters, controlled emission rate and cartridge filter efficiency is calculated based on the manufacturer's certification that maximum emissions are 0.002 grains/SCF for particle sizes of
- 0.5 micron and larger. Gen 3 fan rating = 1600 CFM. Gen4 is loaded with ECO filters rated at 99.7% control efficiency.
- 5. Total PM₁₀ emissions based on maximum possible Gen3 and Gen4 operations. Therefore Proposed Modification Uncontrolled PM₀ Rate is the sum of each applicator's maximum lb/hr feed rates less deposition efficiencies. Proposed Modification Controlled Rates include control equipment efficiency.



NxEdge PTC Mod

Gen3 Spray Applicator Max Throughput

23190 DEL LAGO • LAGUNA HILLS, CA 92653 PHONE: (949) 770-1160 FAX: (949) 770-6717 E-MAIL: INFO@LPPS.COM

DATE:

JULY 2, 2007

TO:

PAUL ROBINSON

NXEDGE, INC.

PHONE: (208) 362-7200

FAX:

(208) 362-7248

PAGES: 2

FROM:

Gary Hislop

BRIGS MACHINING

COMPANY

PHONE: (949) 770 1160

FAX: (949) 770 6717

RE: Throughput of BPC-180 PIASMA GUN

The BPC-180 Plasma Gun systems maximum throughput is 230 grams per minute in ideal conditions Using the BPC-180 Plasma Gun with the 171D-Powder Feeder

We hope that this is the information that you need. If you have any questions please feel free to call us. We look forward to working with you.

Best Regards

BRIG'S MACHINING COMPANY Gary Hislop



RECORD OF TELEPHONE CONVERSATION

3459 E. Boulder Heights Dr. Boise, Idaho 83712 208.345.7222 fax 208.345.8285 www.torf.us

Party(s):

Sarah Stine and Tyler Drady

Project:

Air PTC Modification

Date:

January 29, 2008

Subject:

MAC Documentation

Called MAC at 1-800-821-2476 to get documentation on MAC unit fans. Left message.

MAC Job numbers: 50014, 39112

Tyler called at 1410 hr (number blocked). He looked up the jobs on his computer.

50014 MACFlo cartridge unit 1555 cfm 4m2f16 A:C 0.9:1

39112 2m2f8 (2) 2300 cfm fan on each unit a:c 1.3:1 2040 ft2 in each

He will send me some documentation/equipment specs backing up this information. He is located in SLC.

FILTER EMISSIONS STATEMENT FOR PTFE Membrane Cartridges

Customer:

Lynn Plasma

Reference:

MAC Job No. 50014 & 39112

Equipment:

PTFE coated Spunbond Polyester Cartridges

Application:

Fill in application or dust type

MAC Equipment, Inc. warrants its filters to be free of mechanical defects for a period of one year from the date of shipment in accordance with the "Warranty and Limitation" statement included with the original proposal.

MAC Equipment, Inc. also expects the emissions of its new PTFE membrane cartridges (QP842), when properly installed, applied and maintained, and when operated per the design parameters referenced in the original proposal and in accordance with the manufacturers operations manuals, to emit no more than approximately 0.002 gr. / dscf of air based on dry dust particle sizes of 0.5 microns and larger.

The Buyer will be responsible for any emissions testing expense and MAC Equipment Inc. reserves the right to be present during any emission tests and shall be notified at least 2 weeks prior to the testing. Emissions testing must be conducted within 30 days of start-up, or 60 days from equipment shipment.

Misuse, abuse, operating outside the stated parameters, and / or water, oil, or hydrocarbons will void the emissions expectation. MAC Equipment, Inc. shall not be held responsible for any failures or excess emissions due to upset operating conditions.

This emissions expectation is contingent upon MAC Equipment receiving a process dust sample for testing, analysis, and approval. Such testing could indicate another filter media as a more suitable choice. The expected emissions are also contingent upon an inlet grain loading acceptable to MAC Equipment.

Under no circumstances will MAC Equipment, Inc. be liable or responsible for incidental or consequential damages.

Adam DuBose Test Lab Manager

Material Safety Data Sheet

Sulzer Metco

Section 1. Chemical Product and Company Identification

Product name

Metco 54, 54NS, 54NS-1, Sulzer Metco 4009, XPT-D009, AE 7906

Supplier

SULZER METCO (US) INC. 1101 Prospect Avenue Westbury, NY 11590-0201 Phone: (516) 334-1300

Emergency Phone:

CHEMTREC 800-424-9300

Calls Outside the United States:

202-483-7616

Material Uses

Metal industry: Used by Spraying

Section 2. Composition, Information on Ingredients

Name

CAS#

% by Weight

Exposure Limits

Aluminium

7429-90-5

99-100

ACGIH TLV (United States, 2002).

TWA: 2 mg/m3

TWA: 10 mg/m3 Form: Dust TWA: 5 mg/m3 Form: Fume NIOSH REL (United States, 2001).

TWA: 5 mg/m3 Period: 10 hour(s). Form: Respirable fraction

TWA, 10 mg/m3 Period: 10 hour(s), Form: Total

TWA: 5 mg/m3 Period: 10 hour(s). OSHA PEL 1989 (United States, 1989).

TWA. 15 mg/m3 Form: Dust TWA: 5 mg/m3 Form: Pyrophoric TWA: 5 mg/m3 Form: Respirable fraction TWA: 5 mg/m3 Form: Welding fume

Section 3. Hazards Identification

Physical State and

Appearance

Powder.

Emergency Overview

WARNING!

CONTAINS MATERIAL WHICH CAUSES DAMAGE TO THE FOLLOWING ORGANS: RESPIRATORY

TRACT, SKIN, EYE, LENS OR CORNEA.

Routes of Entry

Not available.

Potential Acute Health Effects

Eyes Prolonged or repeated exposure to even very small quantities may be irritating (redness, tears and

Skin May cause skin sensitization.

Inhalation Prolonged or repeated inhalation may be irritating (depressed respiration, coughing and sore throat).

Ingestion Not available.

Potential Chronic Health Effects

Carcinogenic Effects Classified None, by NIOSH (aluminium).

Medical Conditions

Repeated or prolonged exposure is not known to aggravate medical condition.

Aggravated by Overexposure:

Date of issue

7/31/2003

MSDS#

50-118

Prepared by

Sulzer Metco (US) Inc.

METCO54

7/21/2003

Print Date

Stanford Materials Corporation

STS Area MSDS Silicon Powder Coating Page 1 of 1

SERIAL NUMBER: ME14P-001

PAGE 1 0F 4

REVISED May 22, 2006

MATERIAL SAFETY DATA SHEET

This form may be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200. IDENTITY (As Used on Label and List): SILICON, POWDERS AND PIECES

SECTION I - PRODUCT IDENTIFICATION

Silicon, powder and pieces

Product Details: Silicon powders and pieces

Stock Number: ME14P Manufacturer/Supplier:

Stanford Materials Corporation

4 Meadowpoint, Aliso Viejo, CA 92656, USA Tel: (949) 362-1746, Fax: (949) 362-1810

http://www.stanfordmaterials.com

<u>UPC/EAN:</u> 231-130-8 SYNONYMS Silicon

CHEMICAL FAMILY: Non-metal DOT HAZARD LABEL: No data.

FORMULA: Si

MOLECULAR WEIGHT: 28.09

SECTION II - HAZARDOUS INGREDIENTS/IDENTITY INFORMATION Silicon, powder and pieces

HAZARDOUS COMPONENTS (CHEMICAL NAME)

NAME:

Silicon

CAS#:

7440-21-3

PERCENTAGE:

0.0 -100.0 %

OSHA PEL:

15 mg/m3

ACGIH TLV:

10 mg/m3

OTHER LIMITS:

15 1116/1115

5mg/m3 resp

SEC.302 (EHS):

No

SEC.304 RQ:

No

SEC.313:

No

SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS Silicon, powder and pieces

PHYSICAL STATES:

[] Gas, [] Liquid, [X] Solid

2355.00 C (4271.0 F) to 2600.00 C (4712.0

1410.00 C (2570.0 F) to 1420.00 C (2588.0

BOILING POINT:

F)

MELTING POINT:

1

SPECIFIC GRAVITY (WATER = 1): DENSITY: 2.33 gm/cc at 25.0 C (77.0 F) No data.

VAPOR PRESSURE (VS. AIR OR MM HG):

1 mm at 1724.0 C (3135.2 F)



PERMIT TO CONSTRUCT APPLICATION

Revision 3 03/27/07

Please see instructions on page 2 before filling out the form.

F100	ase see mstructions on po	age z beio	ie ming out in	ie iuiii.		WWW.6400Williamiconomiconomiconomiconomico					
				IDENTIFICAT	TION						
Co	mpany Name:		Facility I	Name:		Facilit	y ID No:				
Nx	Edge, Inc.			001-00202							
Brie	f Project Description:		Facility I	Equipment an	d Throughput	Modifications					
		MISSIONS	S UNIT (PROC	CESS) IDENT	FIFICATION 8	DESCRIPTIO	N .				
1.	Emissions Unit (EU) Name:	GEN	N 4 PLASMA SPRAY APPLICATOR (FOR SS TUBES)								
2.	EU ID Number:	GEN	4				***************************************				
3.	EU Type:		New Source								
4.	Manufacturer:	PRA	XAIR								
5.	Model:	SG-1	00	,							
6.	Maximum Capacity:	17.2	LB/HR POWDER								
7.	Date of Construction:	2003									
8.	Date of Modification (if any)	AWA	AITING PTC MOD	IFICATION APP	ROVAL - 2Q 2008		1500 min -				
9.	s this a Controlled Emission Ur	nit? 🔲 N	o ⊠Yes IfYe	s, complete the	following section.	If No, go to line 18	3.				
			EMISSION	IS CONTRO	L EQUIPMEN						
10. C	Control Equipment Name and ID):	Cyclone and Filter Assembl- MAC2 A&B								
11. C	Pate of Installation:		2003	12. Date of Mo	dification (if any):						
13. N	lanufacturer and Model Numbe	r:	MAC Cyclone	and two MAC 2	M2F8 Filter Units	fitted with high-ef	ficiency Cartridge Filters (16 total)				
	O(s) of Emission Unit Controlled		GEN4								
	s operating schedule different the (s) involved?	nan emission	Lifes And								
	oes the manufacturer guarante ency of the control equipment?	e the control	ol Yes								
CITICI	slicy of the control equipment?		Pollutant Controlled								
		PM	PM10	SO ₂	NOx	voc	со				
	Control Efficiency	99.7%	99.7%								
	manufacturer's data is not ava pport the above mentioned con			of paper to prov	ride the control ec	quipment design sp	pecifications and performance data				
				SCHEDIII E	(hours/day	hours/year, or	other)				
18.	Actual Operation		/WEEK, 50 WEEK								
	Maximum Operation		RS/YEAR								
				EQUESTED I	LIMITS						
20.	Are you requesting any permit	limits?	⊠ Yes 🔲		ck all that apply b	pelow)					
	☐ Operation Hour Limit(s):										
	☐ Production Limit(s):										
	☐ Material Usage Limit(s):										
	☐ Limits Based on Stack Tes	ting F	Please attach all r	elevant stack tes	sting summary rep	oorts					
	☑ Other:	E	MISSION LIMITS	ON PM10							
21.	Rationale for Requesting the L	_imit(s): E	EMISSIONS MUST BE CONTROLLED TO COMPLY WITH AMBIENT AIR QUALITY STANDARDS								

Permit to Construct Modification Application NxEdge, Boise, Idaho May 19, 2008 Page 3.2-1

3.2 STS Gen4 Tube Spray Chamber

The STS Gen4 Tube Spray Chamber (Gen4) is used to apply metal powder to 304 SS tubes via the plasma spray process. This unit is permitted under the existing PTC and has undergone no equipment changes. NxEdge requests a change to the permit limits which will allow unrestricted coating of tubes (based on equipment capacity) with titanium dioxide powder.

A Praxair Model SG-100 Spray Gun is used to apply titanium dioxide to the exterior of tubes typically measuring 6-10 feet long and 6 inches in diameter. Emissions from Gen4 are controlled via a downstream MAC cyclone and cartridge filter assembly (MAC2). The filter assembly consists of two parallel MAC Model 2M2F8 Units each loaded with 8 fire retardant-coated cellulose/synthetic blend cartridges. Two 2300 CFM rated fans located on the outlets of the filter assemblies draw air from the process area, through the Gen4 chamber, and then through ducting to the outdoor cyclone and filter assemblies. The fans discharge horizontally directly above the filter assemblies at a height of 14.9 feet.

The two Gen4 emission points and the Gen3 emission point are located within a few feet of each other and all discharge horizontally at the same height. For air dispersion modeling purposes, the three emission points are combined into one, shown as EP-1 on Form PP. This approach was used and approved for the air dispersion modeling performed in support of the original permit.

Titanium dioxide particulate emissions from Gen4 are calculated in Table 3-1A (see Section 3.1). All particulate emissions are conservatively assumed to be PM_{10} . Uncontrolled emissions are estimated using the maximum applicator rate, 24 hours per day, 365 days per year. Attached is a specification sheet for the Praxair SG-100 spray gun stating the maximum throughput of the applicator as 6.0 pounds per hour when spraying AL-104 powder with a specific gravity of 1.37. The specific gravity of the titanium dioxide powder is 4.3 (see attached MSDS). Assuming a constant volume spray rate, the maximum spray rate for titanium dioxide is 18.8 pounds per hour.

Uncontrolled emissions are reduced by the amount of powder deposited on the tube. The average deposition efficiency (DE) in Gen4, as determined by NxEdge testing, is 42.3 wt%. Table 3-2 details the DE test results. A DE of 42 wt% is used in the Table 3-1A Gen4 calculations. The resulting uncontrolled emissions of PM₁₀ would violate ambient air quality standards. Therefore, controlled emissions are calculated.



Permit to Construct Modification Application NxEdge, Boise, Idaho May 19, 2008 Page 3.2-2

Table 3-2: Gen4 Deposition Efficiency

Date	Gen4 Tube ID No.	Pre-Coated Tube Weight (lbs)	Final Coated Tube Weight (lbs)	Coating Used (lbs)	Deposition Efficiency (%)
10-Sep-07	126D0706VDS	100.10	158.60	125.84	46.5%
9-Sep-07	126D0705VDS	100.00	161.00	128.35	47.5%
7-Sep-07	126D0704VDS	103.20	158.40	148.20	37.2%
6-Sep-07	126D0067VDS-11	102.10	159.70	137.70	41.8%
5-Sep-07	126D0126VDS-11111	99.40	157.30	130.04	44.5%
4-Sep-07	126D0569VDS-1111	98.80	165.00	160.14	41.3%
1-Sep-07	126D0666VDS-11	101.70	158.80	124.70	45.8%
31-Aug-07	126D0005NXVDS-UNX	90.50	154.10	146.70	43.4%
30-Aug-07	126D0020NXVDS-UNX	90.20	153.20	166.30	37.9%
29-Aug-07	126D0242NXVDS	95.20	159.80	174.40	37.0%
			Average =		42.3%

Controlled emissions are calculated based on continuous operations 8760 hours per year and an emission control efficiency of 99.7 wt%, as certified by the filter manufacturer. Attached is a performance statement from ECO Environmental Filtration for the MAC2 filters. Based on this control efficiency, the maximum particulate emissions from Gen4 are 0.033 lb/hr and 0.14 tons per year. These are the proposed permit limits for Gen4.



Rev. 5/98

PRAXAIR THERMAL SG-100 SPRAY SYSTEM

Gun		• • • • • • • • • • • • • • • • • • • •	SG-100
Anode		• • • • • • • • • • • • • • • • • • • •	2083-484
Cathode			1083A-129
Gas Injector	• • • • • • • • • • • • • • • • • • • •	• • • • • • • • • • • • • • • • • • • •	
Gases	psi	(kPa)	Orifice
Primary (Ar)	60		
		(414)	56
Secondary (He)		(827)	80(1)
Carrier (Ar)	30/35	(207/241)	77
Operating Voltage		• • • • • • • • • • • • • • • • • • • •	28 to 32
Amps			
Spray Distance			3 () to 4 () inches
op		• • • • • • • • • • • • • • • • • • • •	
C D1. /0\			(76 to 102 mm)
Spray Rate (2)	• • • • • • • • •	• • • • • • • • • • • • • • • •	.5.0 to 6.0 lbs/hr
		+	(38 to 45 g/min)

- (1) Adjust He flow to obtain voltage
- (2) Powder feeder tamper not required

METCO 7M/9M PLASMA SPRAY SYSTEMS

Gun			GH/73:
Gases	psi	(kPa)	Flow
Primary (Ar)	100	(690)	150
Secondary (H2)		(345)	10
Carrier (Ar)	100	(690)	37
Voltage (2) Amperage Spray Distance			495 to 505 5.0 to 6.0 inches 127 to 152 mm
Spray Rate	• • • • • • • • •		6.0 to 6.5 lbs/h [45 to 49 g/min
			_

- (1) Use argon distribution ring
- (2) Adjust H2 flow to obtain voltage

PLASMA-TECHNIK SYSTEMS M1000/A2000/A3000

Powder Port	6 mm
	······ +15°
Gases	Flow I/min
Primary (Ar)	38.0
Secondary (H2)	12.5
Carrier (Ar)	
Amperage	499 to 502
Spray Distance	6.5 to 7.0 inches
	(165 to 178mm)
Spray Rate (1)	4.5 to 5.0 lbs/hr
	(34 to 38 g/min)

(1) Use L suction plate/spreader with stirrer motor on

RECOMMENDATIONS

The parameters presented above are intended as starting points. Modifications may be required based upon part geometry and coating usage. When requested, alternate parameters, using other gas combinations may be provided.

PRAXAIR AL-104, is a tightly controlled, premium grade, gas atomized, commercially pure aluminum powder. The powders' free flowing characteristics are owed to the sphericity of its individual particles. Coatings are suited for salvage/repair of either aluminum or magnesium components, corrosion protection of steel and high frequency shielding. There are not any apparent thickness limitations on coating build-up; however, the use of a nickel aluminum bond coat of PRAXAIR NI-109 is recommended.

Thermal spray powders, because of their fineness and high surface area may have a tendency to absorb moisture. Flow rate may be enhanced by storing in a drying cabinet or warming the powder for 2 hours, before usage, at 175°F to 200°F (80°C to 93°C). Remove the tamper proof seal and loosen the container cap prior to heating. To avoid possible powder segregation, gently tumble the storage container prior to dispensing the spray material to the powder feed unit.

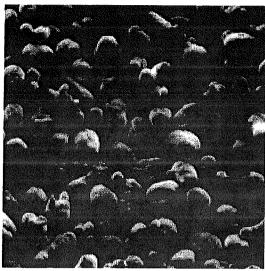
PRAXAIR AL-104, and all thermal spray powders, should always be sprayed in a well ventilated area. Avoid skin contact or prolonged inhalation. When spraying **PRAXAIR AL-104** for long periods the operator should be wearing protective clothing.

PRAXAIR SURFACE TECHNOLOGIES INC, 1555 MAIN STREET, INDIANAPOLIS IN 46224 • 317.240.2650 • 800.825.3093 • FAX 317.240.225



PRAXAIR AL-104

GAS ATOMIZED, SPHERICAL, FREE FLOWING PURE ALUMINUM POWDER PROVIDES ENVIRONMENTAL CORROSION PROTECTION FOR STEEL PARTS







Original Magnification: 250)

TYPICAL POWDER PROPERTIES

Chemical	Composition
	0.0

TYPICAL COATING PROPERTIES

Hardness

Rockwell 15T65 Minimu	
Rb Conversion	15
BHN500 Conversion	70
Tensile/Bond Strength	
3,000 psi, Minimum	a)
Over a roughened, grit blasted substrate	
As-sprayed Surface Texture	
Approximately 450 to 750 Ra	
Specification Approval	
GE Aircraft EngineB50TF57 Cl	LA
Comparable Powders	

Sulzer MetcoAmdry 357/Metco 54NS-1



Oct 31 07 08:49p

David H. Shupe

(502) 212-4103

n 2

NxEdge PTC Modification

Gen4/MAC2 Filter Certification



Media Specification

ECOBLEND™ FR

Composition: Cellulose / Synthetic Blend with Fire Retardant Treatment

Basis Weight:

90 lbs/3000ft²

Thickness:

0.029 inches

Bursting Strength (Mullen Method):

44 psi

Air Permeability @ 1/2" wg (Frazer Method):

15 cfm

Max Operating Temp (continuous):

175° F

Efficiency:

99.7% @ 0.5 µm

All values are averages Specifications are subject to change without notice

M5-26005 (06/05)

Material Safety Data Sheet

Sulzer Metco

Section 1. Chemical Product and Company Identification

Product name

Metco 102, AMDRY 6500, 6505, 6510, XPT-D 704, 707

Supplier

SULZER METCO (US) INC. 1101 Prospect Avenue Westbury, NY 11590-0201 Phone: (516) 334-1300

Emergency Phone:

CHEMITREC 800-424-9300

Calls Outside the United States:

202-483-7616

Material Uses

Metal industry: Used by Spraying

Section 2. Composition, Information on Ingredients

Name

CAS#

% by Weight

Exposure Limits

Titanium Dinxide

13463-67-7

100

ACGIH TLV (United States, 2002).

TWA: 10 mg/m³

OSHA PEL 1989 (United States, 1989). TWA: 10 mg/m3 Form: Total dust

Section 3. Hazards Identification

Physical State and

Powder. Appearance

Emergency Overview

WARNING!

CONTAINS MATERIAL WHICH CAUSES DAMAGE TO THE FOLLOWING ORGANS: LUNGS,

RESPIRATORY TRACT, SKIN.

Routes of Entry

Not available.

Potential Acute Health Effects

Eyes Irritating to eyes. Exposure may result in impaired vision, tears, redness and pain.

Skin Exposure to high concentrations may result in health complaints. Prolonged or repeated exposure may be irritating (redness, pain).

Inhalation Exposure to high concentrations may result in health complaints. Irritating to respiratory system.

Exposure may result in depressed respiration, coughing, nausea and sore throat. Prolonged or

repeated exposure to large amounts may cause damage to lungs (lung edema).

Ingestion Prolonged or repeated exposure may be irritating to mouth, throat and esophagus (sore throat,

Potential Chronic Health Effects

Carcinogenic Effects Classified None, by NIOSH [titanium dioxide]. Classified A4 (Not classifiable for human or animal.) by ACGIH, 3 (Not classifiable for human.) by IARC [titanium dioxide].

Medical Conditions

Repeated or prolonged exposure is not known to aggravate medical condition.

Aggravated by Overexposure: Overexposure

Not available.

/Signs/Symptoms

See Toxicological Information (section 11)

METCO102 Date of issue

7/17/2003

Print Date

7/24/2003

MSDS#

Prepared by

50-136

Sulzer Metco (US) Inc.

Page: 3/5

Metco 102, AMDRY 6500, 6505, 6510, XPT-D

704, 707

Protective Clothing (Pictograms)



Personal Protection in Case Wear suitable protective clothing, gloves and eye/face protection. of a Large Spill

Consult local authorities for acceptable exposure limits.

Section 9. Physical and Chemical Properties

Physical State and

Powder.

Appearance

Greyish.

Color Odor

Odorless.

Melting/Freezing Point

1750 to 2000°C (3182 to 3632°F)

Specific Gravity

3.9 to 4.3 (Water = 1)

Solubility

Solubility in water:

Insoluble.

Section 10. Stability and Reactivity

Stability and Reactivity

Stable under normal conditions.

Hazardous Decomposition

Ozone and nitric oxide are formed by plasma flame. This action is independent of material.

Products

Hazardous Polymerization Will not occur.

Section 11. Toxicological Information

Chronic Effects on Humans

CARCINOGENIC EFFECTS: Classified None. by NIOSH [titanium dioxide]. Classified A4 (Not classifiable for human or animal.) by ACGIH, 3 (Not classifiable for human.) by IARC [titanium]

dioxide].

Contains material which causes damage to the following organs: lungs, upper respiratory tract, skin.

Other Toxic Effects on

Humans

No specific information is available in our database regarding the other toxic effects of this material

for humans.

Section 12. Ecological Information

Ecotoxicity Data

Ingredient Name

Species

Period

Result

Products of Degradation

Some metallic oxides.

Toxicity of the Products of

The product itself and its products of degradation are not toxic.

Biodegradation

Section 13. Disposal Considerations

Waste Information

Methods of disposal:

Disposal according to the local legislation.

Waste of residues:

Keep waste separate. Because of possible pollution, remove as industrial waste or hazardous waste.

Contaminated packaging:

Keep waste packaging separate. Because of possible pollution, remove as industrial waste or

hazardous waste.

Waste Stream

Not available.

Consult your local or regional authorities.

METCO102

MSDS#

50-136

Date of issue

7/17/2003

Print Date

7/24/2003

Prepared by

Sulzer Metco (US) Inc.

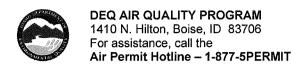


PERMIT TO CONSTRUCT APPLICATION

Revision 3 03/27/07

Please see instructions on page 2 before filling out the form.

, 3		j	DENTIFICAT	ION .					
Company Name:		Facility N	Name:		Facilit	y ID No:			
NxEdge, Inc.					001-0	0202			
Brief Project Description:		Facility Equipment and Throughput Modifications							
EMIS	SIONS	JNIT (PROC	ESS) IDENT	IFICATION &	DESCRIPTIO	N			
Emissions Unit (EU) Name:	GEN 5 C	5 COATING APPLICATOR (FOR SS TUBES)							
2. EU ID Number:	GEN5 (F	N5 (PLASMA OPS, SEE ALSO "WIRE OPS")							
3. EU Type:			Unpermitted Exermitted Source	xisting Source Previous Permi	it #:P-040007	Date Issued: 07/22/2005			
4. Manufacturer:	BRIGS								
5. Model:	BPC-180)							
6. Maximum Capacity:	30.4 LB/	HR POWDER							
7. Date of Construction:	2003								
8. Date of Modification (if any)	AWAITI	NG PTC MODI	FICATION APPE	ROVAL - 2Q 2008					
9. Is this a Controlled Emission Unit?	□ No	⊠ Yes If Ye	s, complete the f	ollowing section.	If No, go to line 18	3.			
		EMISSION	S CONTROL	EQUIPMEN	T .				
10. Control Equipment Name and ID:		Cyclone and Filter Assembly- FARR2							
11. Date of Installation:		2003 12. Date of Modification (if any): 2Q 2008							
13. Manufacturer and Model Number:		Camfil-Farr Cyclone and GS24 Filter Assembly fitted with high efficiency cartridge filters (20)							
14. ID(s) of Emission Unit Controlled:		GEN5				·			
15. Is operating schedule different than units(s) involved?									
16. Does the manufacturer guarantee the efficiency of the control equipment?	e control	☑ Yes ☐ No (If Yes, attach and label manufacturer guarantee)							
		Pollutant Controlled							
	PM	PM10	SO₂	NOx	voc	со			
Control Efficiency	99.99%	99.99%							
17. If manufacturer's data is not availabl to support the above mentioned control		separate sheet	of paper to provi	de the control eq	uipment design sp	pecifications and performance data			
EMISSION	UNIT O	PERATING	SCHEDULE	(hours/day, l	hours/year, o	[•] other)			
18. Actual Operation	48 HRS/WI	EEK, 50 WEEK	S/YR						
19. Maximum Operation	8760 HRS	/YEAR		·					
		RE	QUESTED L	.IMITS					
20. Are you requesting any permit limi	ts?	Yes 🗆 1	lo (If Yes, che	ck all that apply b	elow)				
☐ Operation Hour Limit(s):									
☐ Production Limit(s):									
☐ Material Usage Limit(s):									
☐ Limits Based on Stack Testing	Plea	ise attach all re	elevant stack tes	ting summary rep	oorts				
☑ Other:	ЕМІ	SSION LIMITS	ON TAPS AND	PM10					
21. Rationale for Requesting the Limit	(s): EMI	EMISSIONS MUST BE CONTROLLED TO COMPLY WITH AMBIENT AIR QUALITY STANDARDS							



PERMIT TO CONSTRUCT APPLICATION

Revision 3 03/27/07

Please see instructions on page 2 before filling out the form.

Trease see mstructions on page				-i.a.vi		·				
		IDENTIFICATION								
Company Name:		Facility	Name:			y ID No:				
NxEdge, Inc.		001-00202								
Brief Project Description:		Facility Equipment and Throughput Modifications								
Εl	SNOISSIN	UNIT (PROC	CESS) IDENT	IFICATION 8	DESCRIPTIO	N				
Emissions Unit (EU) Name:	GEN 5	N 5 COATING APPLICATOR (FOR SS TUBES)								
2. EU ID Number:	GEN5 (WIRE OPS, SEI	E ALSO "PLASMA	A OPS")						
3. EU Type:		New Source								
4. Manufacturer:	SULZE	R METCO								
5. Model:	SMAR	TARC PPG								
6. Maximum Capacity:	70 LB/I	IR WIRE								
7. Date of Construction:	2003									
8. Date of Modification (if any)	TIAWA	ING PTC MOD	IFICATION APPE	ROVAL - 2Q 2008	:	ware.				
9. Is this a Controlled Emission Unit	t? No	A. Adden. 2016 of residence of	State of the control	number of the second	If No, go to line 18					
		EMISSIONS CONTROL EQUIPMENT								
10. Control Equipment Name and ID:		Cyclone and Filter Assembly- FARR2								
11. Date of Installation:	we we will be a second of the	2003	12. Date of Mod	dification (if any):	2Q 2008					
13. Manufacturer and Model Number	•	Camfil-Farr C	yclone and GS2	4 Filter Assembly	fitted with high eff	ficiency cartridge filters (20)				
14. ID(s) of Emission Unit Controlled:		GEN5								
15. Is operating schedule different that units(s) involved?	an emission	Lies 🖸 No								
16. Does the manufacturer guarantee efficiency of the control equipment?	e the control	ol ⊠ Yes □ No (If Yes, attach and label manufacturer guarantee)								
Condition of the Service Condition		Pollutant Controlled								
	PM	PM10	SO ₂	NOx	voc	со				
Control Efficiency	99.99%	99.99%								
17. If manufacturer's data is not availate support the above mentioned contra		separate sheet	of paper to prov	ide the control ec	quipment design sp	pecifications and performance data				
EMISSI	ON UNIT C	PERATING	SCHEDULE	(hours/day.	hours/year, o	other)				
18. Actual Operation	***************************************	EEK, 50 WEEK	5050 00,000,000 00 00 00 00 00 00 00 00 00							
19. Maximum Operation	8760 HR	S/YEAR								
			EQUESTED L	LIMITS						
20. Are you requesting any permit I	limits?	21 12 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Transaction of the secondaries and	ck all that apply b	pelow)					
☐ Operation Hour Limit(s):										
☐ Production Limit(s):										
☑ Material Usage Limit(s):										
☐ Limits Based on Stack Testi	ng Ple	ase attach all r	elevant stack tes	ting summary rep	oorts					
Other:	EM	EMISSION LIMITS ON TAPS AND PM10								
21. Rationale for Requesting the Li	mit(s): EM	EMISSIONS MUST BE CONTROLLED TO COMPLY WITH AMBIENT AIR QUALITY STANDARDS								

Permit to Construct Modification Application NxEdge, Boise, Idaho May 19, 2008 Page 3.3-1

3.3 STS Gen5 Tube Spray Chamber

The STS Gen5 Tube Spray Chamber (Gen5) is used to apply metal powder to 304 SS tubes via the plasma spray process and metal wire to SS tubes via the wire arc spray process. This unit is permitted in the existing PTC and has undergone no equipment changes, except that the discharge of the emission control equipment will be modified from a horizontal to vertical orientation. NxEdge requests changes to the permit limits which will allow unrestricted coating of tubes (based on equipment capacity) with aluminum, silicon, and zirconium powders and molybdenum, tin, titanium/aluminum and zinc/aluminum wires. In addition, NxEdge requests changes to the permit limits which will allow restricted coating of tubes with wire containing nickel and chromium.

When Gen5 is in plasma spray operations, a Brigs Model BPC-180 Spray Gun is used to apply metal powders to the exterior of tubes typically measuring 6-10 feet long and 6 inches in diameter. When Gen5 is in wire arc spray operations, a Sulzer Metco Model SmartArc PPG Spray Gun is used to apply wire to the exterior of the SS tubes. Emissions from Gen5 are controlled via a downstream cyclone and cartridge filter assembly (FARR2) manufactured by Camfil Farr. The filter assembly is a Farr Model GS24 loaded with 20 cartridges. A 5000 CFM rated fan located on the outlet of the filter assembly draws air from the process area, through the Gen5 chamber, and then through ducting to the cyclone and filter assembly, both located outdoors. With this modification, the fan will discharge vertically directly above the filter assembly at a height of 20 feet. The emission point, EP-13 is shown on Form PP.

Metal and particulate emissions from Gen5 are calculated in Table 3-3A (attached). All particulate emissions are conservatively assumed to be PM₁₀. Uncontrolled emissions are estimated using the maximum applicator rate, 24 hours per day, 365 days per year. Attached is a letter from Brig's Machining Company specifying the maximum throughput of the Brigs spray gun as 230 grams per minute (30.4 pounds per hour). Attached also is a specification sheet for the SmartArc gun stating the maximum throughput of the spray gun as 70 pounds per hour.

Uncontrolled emissions from Gen5's plasma spray operations are reduced by the amount of powder deposited on the tubes. Since Gen5 will use the same applicator as Gen3 to coat tubes with silicon and aluminum, the 27 wt% DE determined for Gen3 is used to estimate Gen5 emissions (see Table 3.1B). Zirconium (Zr) plasma spray is a new operation being proposed in this PTC modification, and DE test results are not available. Therefore, an estimated DE of 25 wt% is used in the Table 3.3A emission calculations for this coating.

Uncontrolled emissions from Gen5's wire spray operations are reduced by the amount of wire deposited on the tube. The average deposition efficiency (DE) for tin and zinc-aluminum wire coating in Gen5, as determined by NxEdge testing, is 53 and 54 wt%, respectively. Table 3-3B details the DE test results. Molybdenum, nickel alloy, and titanium-aluminum wire arc spray are new operations being proposed in this PTC modification, and DE test results are not available. Therefore,



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an estimated DE of 50 wt% is used in the Table 3.3A calculations for these coatings.

Table 3-3B: Gen5 Deposition Efficiency

Table 3-3B: Gens Deposition Efficiency										
Date Sprayed Coating		Pre-Coated Tube Weight (lbs) ¹	Final Coated Tube Weight (lbs)	Coating Used (lbs)	Deposition Efficiency (%)					
4-Sep-07	Si-Al Powder	91.1	129.6	143.3	26.9%					
4-Sep-07	Si-Al Powder	93.7	130.5	131.9	27.9%					
6-Sep-07	Si-Al Powder	91.9	136.0	158.1	27.9%					
6-Sep-07	Si-Al Powder	91.3	128.7	138.0	27.1%					
7-Sep-07	Si-Al Powder	91.9	128.1	151.6	23.9%					
11-Sep-07	Si-Al Powder	102.1	162.9	233.0	26.1%					
11-Sep-07	Si-Al Powder	109.0	169.0	199.8	30.0%					
14-Sep-07	Si-Al Powder	94.8	156.0	250.0	24.5%					
			Average :	Si-Al D.E.=	27%					
4-Apr-07	Zn-Al Wire	100	256.9	301.0	52.1%					
10-Apr-07	10-Apr-07 Zn-Al Wire		250.8	290.5	51.9%					
11-Apr-07	1-Apr-07 Zn-Al Wire		261.9	300.3	53.9%					
12-Apr-07	Zn-Al Wire	100	252.7	308.2	49.5%					
17-Apr-07	Zn-Al Wire	100	255.1	295.0	52.6%					
18-Apr-07	Zn-Al Wire	100	254.4	305.0	50.6%					
19-Apr-07	Zn-Al Wire	100	297.3	297.3	66.4%					
24-Apr-07	Zn-Al Wire	100	250.7	288.1	52.3%					
			Average Z	n-Al D.E.=	54%					
11-Dec-06	Tin Wire	100	290.2	360.0	52.8%					
11-Dec-06	Tin Wire	100	291.0	358.0	53.4%					
1-Apr-07	Tin Wire	100	291.6	375.4	51.0%					
2-Apr-07	Tin Wire	100	290.9	333.6	57.2%					
25-Apr-07	Tin Wire	100	263.4	355.7	45.9%					
26-Apr-07	Tin Wire	100	296.0	343.2	57.1%					
30-Apr-07	Tin Wire	100	285.3	346.0	53.6%					
			Average	e Tin D.E.=	53%					
Notes: 1. Pre-coated tube weight for ZnAl and Tin assumed to be 100 lbs.										

Elemental chromium is present in the proposed nickel-chromium wire feed to Gen5. While hexavalent chromium (Cr(VI)) is not present in the wire, industry stack tests have measured



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emissions of Cr(VI) from thermal spraying facilities, indicating that some chromium conversion occurs during the spray process.⁴ This conversion was quantified in a 2004 California Air Resources Board report which surveyed existing research and sponsored studies to develop emission estimation methods for thermal spraying.⁵ An excerpt of the study is attached and includes a summary table (Table C-3) of emission factors for Cr(VI) emissions based on the amount of chromium in the process feed. The uncontrolled emission factor for the twin-wire electric arc spray process is 0.00696 pounds Cr(VI) per pound of chromium sprayed. This factor is used to estimate Cr(VI) uncontrolled emissions from Gen5.

The uncontrolled emissions of all TAPs in the Gen5 coatings would violate ambient air quality standards. Therefore, controlled emissions are calculated.

Controlled TAP emissions are calculated based on a control efficiency of 99.99 wt%, as certified by the filter manufacturer. During plasma operation, Farr DPT-200 polyester filters are loaded in FARR2. During wire spray operations, Farr HMPT-325 cellulose/polyester filters are loaded in FARR2. Attached are filter certification letters from Farr APC specifying 99.99% control efficiency for both Farr filter types.

Except for nickel and Cr(VI), all controlled TAP emissions are based on unrestricted, continuous operations 8760 hours per year. The feed rates of nickel-chromium and nickel-vanadium wires are restricted so that controlled emissions rates of nickel and Cr(VI) meet ambient air quality standards while also meeting NxEdge's projected production needs. The controlled TAP emission rates for Gen5 are shown in the TAP Emissions Summary in Table 3.3A. These are the proposed permit limits for Gen5.

Controlled annual PM_{10} emissions from Gen5 are calculated based on continuous operations 8760 hours per year and a control efficiency of 99.99 wt%, as certified by Farr. Controlled hourly PM_{10} emissions are based on the 0.002 grains per cubic foot filter outlet rate guaranteed by Farr at the maximum allowable filter loading. Permitting at this rate allows flexibility if short term particulate feed rates are higher than expected. Based on these control efficiencies, the controlled hourly and annual PM_{10} rates are 0.185 pounds per hour and 0.024 tons per year, proposed permit limits.

⁴ "Appendix C: Methodology for Estimating Hexavalent Chromium Emissions from Thermal Spraying," California Air Resources Board, www.arb.ca.gov/regact/thermspr/appc.doc.





Table 3-3A: STS Area Emissions- Gen 5

***************************************							E	MISSION CA	LCULATIO	NS WITH UNR	ESTRICTED I	FEED AND PR	ODUCTION	RATES						
		Coating	Content	CAS Number	Content Conc. (wt% per MSDS)	Application Device	Equipment Maximum Feed Rate (lb/hr) Notes 1,2	Max Coating in Pre-mixed Feed (%)	Daily Operating Hours	Daily Coating Use (Ibs)	Yearly Operating Days	Annual Coating Use (Ibs)	Coating Retention on Target (%) ^{Note 3}	Uncontrolled Hourly Emissions (lb/hr)	585/586 TAP Screening Level (lb/hr)	Uncont. Annual Emissions (lb/yr)	FARR2 Filter Unit: Filter Type (currently)	Control Equipment Efficiency (%) ^{Note 4}	Controlled Hourly Emissions (lb/hr)	Controlled Annual Emissions (lb/yr)
		Aluminum Powder	Aluminum	7429-90-5	100.0%	Brigs BPC-180	30.4	60%	24	438	365	159764	27%	13.3	0.667	116628	Farr DPT-200 Polyester	99.99%	0.0013	11.7
	- 1	Lime	Ca(OH) ₂	1305-62-0	65.0%		Injected (20 lb/hr) in cyclone outlet			4 480 365		175200	0%	13.0	0.333	113880	Farr HMPT-325	99.99%	0.0013	11.4
	- 1		Mg(OH) ₂	1309-42-8	35.0%	when	Tin Wire is applied					170200	0,0	7.0	non-TAP	61320	1 all 1 livil 1-323	33.3376	0.00070	6.1
		Moly Wire Note 5	Molybdenum	7439-98-7	100.0%	SmartArc	70	100%	24	1680	365	613200	50%	35.0	0.667	306600	Farr HMPT-325 Cellulose/PE	99.99%	0.0035	30.7
		NiCr Wire	Nickel		50.0%	50.0% SmartArc	70					,		17.5	2.7E-05	153300	F LIMPT OF		0.0017	15.3
PLGEN5		Note 5	Chromium	7440-47-3	50.0%			100%	24	1680	365	613200	50%	17.5	0.033	153300	Farr HMPT-325 Cellulose/PE	99.99%	0.0017	15.3
뜅ㅣ	<u>.</u>		Cr (VI) Note 6	18540-29-9	0%									0.24	5.6E-07	2134] Ochalose/i L		2,44E-05	0.21
립	∄	NiVa Wire	Nickel	7440-02-0	90.0%	SmartArc	70	100%	24	1680	365	613200	50%	31.5	2.7E-05	275940	Farr HMPT-325	99.99%	0.0031	27.6
	Coating		Vanadium	7440-62-2	20.0%								30%	7.0	0.003 ^{Note 9}	61320	Cellulose/PE	33.3376	0.00070	6.1
Source:	Tebe	Silicon Powder	Silicon	7440-21-3	100.0%	Brigs BPC-180	30.4	98%	24	715	365	260948	27%	21.7	0.667	190492	Farr DPT-200 Polyester	99.99%	0.0022	19.0
STS	-	Tin Wire	Tin	7440-31-5	100.0%	SmartArc	70	100%	24	1680	365	613200	53%	32.9	0.133	288204	Farr HMPT-325 Cellulose/PE	99.99%	0.0033	28.8
"	Γ	TiAl Wire	Titanium		50.0%	SmartArc	70	100%	24	1680	365	613200	50%	17.5	non-TAP	153300	Farr HMPT-325		0.0017	15.3
- 1		Note 5	Aluminum	7429-90-5	50.0%	SmanAic	70	100%	24	1680	303	613200	50%	17.5	0.667	153300	Cellulose/PE	99.99%	0.00175	15.3
l i		Zirconium	Zr Oxide	1314-23-4	91%	Drive								20.7	0.333	181752			0.0021	18.2
- 1		Powder	Yttrium Oxide	1314-36-9	13%	Brigs BPC-180	30.4	100%	24	730	365	266304	25%	3.0	0.067	25965	Farr DPT-200 Polyester	99.99%	0.00030	2.6
- 1			Hafnium Oxide		1.8%	5, 5 .55								0.41	0.033	3595	Follyester		4.1E-05	0.36
			Zinc	7440-66-6	99.0%									31.9	0.667	279251			0.0032	27.9
			Aluminum	7429-90-5	16.5%									5.3	0.667	46542			0.00053	4.7
			Cadmium	7440-43-9	0.005%									1.6E-03	3.7E-06	14.1	Farr HMPT-325		1.6E-07	0.0014
- 1		Zn/Al Wire	Copper	7440-50-8	0.75%	SmartArc	70	100%	24	1680	365	613200	54%	0.24	0.067	2116	Cellulose/PE	99.99%	2.4E-05	0.21
- 1	1		Iron	7439-89-6	0.75%									0.24	non-TAP	2116			2.4E-05	0.21
			Lead	7439-92-1	0.007%									2.3E-03	non-TAP	19.7			2.3E-07	0.0020
	1		Titanium	7440-32-6	0.20%			l						0.064	non-TAP	564	L		6.4E-06	0.06

	EMISSION CALCULATIONS WITH RESTRICTED ANNUAL FEED AND PRODUCTION RATES (Note 7)														
PLGEN5	ating	Coating	Content	CAS Number	Content Conc. (wt% per MSDS)	Application Device	Restricted Annual Coating Use (lbs)	Restricted Annual Targets Note 8	Coating Retention on Target (%) ^{Note 3}	FARR2 Filter Unit: Filter Type (currently)	Control Equipment Efficiency (%) ^{Note 4}	Controlled Annual Avg Emissions (lb/hr)	Cont. Annual Emissions (lb/yr)		
ë	၂ ပိ	NiCr Wire	Nickel	7440-02-0	50.0%	SmartArc	13500	30	50%	Farr HMPT- 325 Cellulose/PE	99.99%	3.9E-05	0.34		
Sour	會	Note 5	Chromium	7440-47-3	50.0%							_	0.34		
	₽.		Cr (VI) Note 6	18540-29-9	0%							5.4E-07	0.0047		
გ		NiVa Wire	Nickel	7440-02-0	90.0%	SmartArc	4500	10			99.99%	2.3E-05	0.20		
ြဟ	ST	Note 5	Vanadium	7440-62-2	20.0%	SilianAic	4500					_	0.045		

	Gen 5	TAP Type	TAP Screening Emission Level (lb/hr)	Uncontrolled	Controlled Hourly Emissions		
	Plasma and Wire Arc Spray	(24 hr or Annual Ave. EL)		Proposed Mod. (lb/hr)	Current Permit (lb/hr)	Proposed Mod. (lb/hr)	Proposed Mod. (lb/yr)
	Aluminum	585 (24 hr)	0.667	17.5	0.00069	0.0036	31.6
	Cadmium	586 (Annl)	3.7E-06	1.61E-03	8.22E-08	1.6E-07	1.4E-03
	Calcium Hydroxide	585 (24 hr)	0,333 0.033	13.0 17.5	0.108 0	0.0013 0.0017	11.4 15.3
Toxic Air Pollutants Emissions Summary	Chromium	585 (24 hr)					
	Chromium(VI)	586 (Annl)	5,6E-07	0.24	0	5.4E-07	4.7E-03
	Copper (dust)	585 (24 hr)	0.067	0.24	3.13E-05	2.4E-05	0.21
	Hafnium	585 (24 hr)	0.033	0.41	0	4.1E-05	0.36
	Molybdenum	585 (24 hr)	0.667	35.0	0	0.0035	30.7
	Nickel	586 (Anni)	2.7E-05	31.5	0	6.2E-05	0.54
	Silicon	585 (24 hr)	0.667	21.7	0	0.0022	19.0
	Tin	585 (24 hr)	0.133	32.9	0.018	0.0033	28.8
	Vanadium Oxide (Note 9)	585 (24 hr)	0.003	10.3	0	0.0010	9.0
	Yttrium	585 (24 hr)	0.067	3.0	0	0.00030	2.6
	Zinc	585 (24 hr)	0.667	31.9	0.0041	0.0032	27.9
	Zirconium	585 (24 hr)	0.333	20.7	0	0.0021	18.2

Hazardous	Gen 5	Controlled Emissions (tons/yr)		
Pollutants	Cadmium	7.1E-07 1.7E-04		
Emissions	Chromium			
Summary	Lead	9.9E-07		
1	Nickel	2.7E-04		
	Total =	4.4E-04		

Notes: Ib/hr).

- 2. Per manufacturer, SmartArc maximum deposition rate is 70 lb/hr.
- 3. Based on NxEdge testing except for molybdenum, nickel/chromium, nickel/vanadium and titanium/aluminum, which are estimated at 50% based on other metals (see Table 3-3B).
- Cyclone efficiency (pre-filter) estimated at 80%, but no certification data available so cyclone emission control not included. For FARR cartridge filters, efficiency is certified at 99.99% for particle sizes of 0.5 micron and larger.
- Mo, NiCr, NiVa and TiAl wire composition based on projected blend, not MSDS.
 Conversion of chromium to hexavalent chromium in wire arc spray process is 0.00596 lb Cr(VI) generated per lb of Cr feed (source: CA EPA Air Resources Board).
- 7. Production restrictions only required for chromium and nickel and only affect annual emission limits.
- 8. NxEdge estimates 450 lbs of wire will be sprayed per target.
- 9. Screening Emission Level for vanadium provided as V_2O_5 . Assume all vanadium emissions become oxidized. V_2O_5 = 68 w% V.
- 10. Total PM_{10} emissions based on maximum possible Gen5 operations. Proposed Modificaton Uncontrolled PM_{10} Rate is based on continuous 70 lb/hr SmartArc feed less 50% deposition efficiency plus lime emissions. Proposed Modification controlled annual PM_{10} rate includes 99.99% control equipment efficiency. Proposed controlled hourly PM10 rate based on 0.002 grains/CF and 5000 CFM fan rating.

Criteria Pollutants Emissions Summary	_	Significant Emission Rate (tons/yr)	Uncontrolled Annual Emissions		Controlled Hourly Emissions		Max. Controlled Annual Emissions		
			Current Permit (ton/yr)	Proposed Mod. (ton/yr)	Current Permit (lb/hr)	Proposed Mod. (lb/hr)	Current Permit (ton/yr)	Proposed Mod. (ton/yr)	Emission Change, ton/yr
	Lead	0.6	2.5E-04	9.9E-03	2.9E-07	2.3E-07	5.0E-07	9.9E-07	4.8E-07
	PM ₁₀ Note 10	15	48.2	240.9	0.185	0.0857	0.365	0.024	-0.341



NxEdge PTC Mod

Gen5 Spray Applicator Max Throughput

23190 DEL LAGO • LAGUNA HILLS, CA 92653 PHONE: (949) 770-1160 FAX: (949) 770-6717 E-MAIL: INFO@LPPS.COM

DATE:

JULY 2, 2007

TO:

PAUL ROBINSON NXEDGE, INC.

PHONE: (208) 362-7200 FAX: (208) 362-7248

PAGES: 2

FROM:

Gary Hislop

BRIGS MACHINING

COMPANY

PHONE: (949) 770 1160 FAX: (949) 770 6717

17.020. 2

RE:

Throughput of BPC-180 PIASMA GUN

The BPC-180 Plasma Gun systems maximum throughput is 230 grams per minute in ideal conditions Using the BPC-180 Plasma Gun with the 171D-Powder Feeder

We hope that this is the information that you need. If you have any questions please feel free to call us. We look forward to working with you.

Best Regards

BRIG'S MACHINING COMPANY Gary Hislop

SULZER

Sulzer Metco

1 General Description

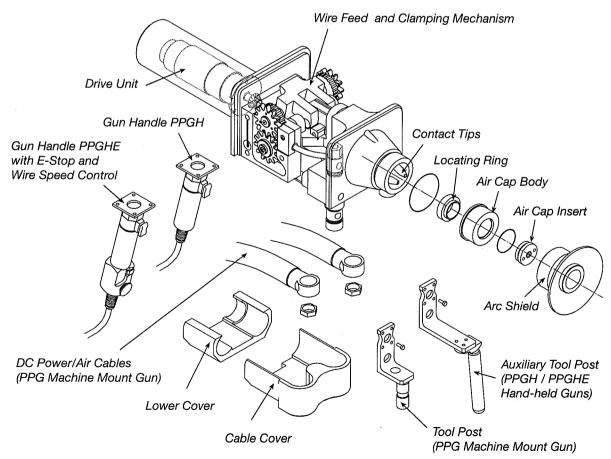
The high power capacity (400 Amps) allows SmartArc to deposit coatings from both hard and soft wires very quickly and economically. Hard wire coatings produced using the SmartArc system have excellent bond strength, high hardness, low porosity and are easily machined. When soft wires are used, exceptionally high speed coatings rates of up to 32 kg/h (70 lbs/hr) are possible.

SmartArc incorporates a leading-edge gun head design that delivers low-turbulence, nearly laminar air flow. This results in high deposition rates, very dense, low oxide coatings and a reduction in consumables and maintenance. Voltage measurement is at the gun for reliability of coating results.

A unique feature of SmartArc is load-sharing; a patented motor control method that provides "push-pull" coordination of the wire feed stock. As a result, wire feed is very smooth, allowing wire conduit cables of up to 15 meters (50 feet). This allows the SmartArc PPG gun to be mounted on a robot or other gun manipulation equipment, for added precision and automation. When the gun "pull" motor, acting as the controller, needs assistance, SmartArc senses the load and has the console motor "push" harder to ensure highly consistent wire feed.

Truly automated, SmartArc incorporates a rugged and reliable PLC (programmable logic control) computer technology for its advanced feature capability and provides diagnostics tests that are easily interpreted by the operator.

Three gun models are available for the SmartArc system. The PPG gun (CE conformant) is a machine-mount push-pull design. Hand-held models are also available as the PPGH and the CE-conformant PPGHE. The PPGHE gun incorporates an integrated, system-wide E-stop on the handle and a wire speed control.



SmartArc™ Gun • Main Parts Overview